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20 TITLE INSURANCE COMPANY, and TICOR TITLE OF  
21 NEVADA, INC.

22 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
23 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE  
COMPANY et al.,

Defendants.

Case No.: 2:21-CV-01854-CDS-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT (ECF No. 1)**

**FOURTH REQUEST**

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG"), Chicago Title Insurance Company ("Chicago Title") and Ticor Title of Nevada, Inc. ("Ticor Agency") (collectively "Defendants") and plaintiff Deutsche Bank National Trust Company ("Deutsche

Bank”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On October 6, 2021 Deutsche Bank filed its complaint in the Eighth Judicial District Court for the State of Nevada;

2. On October 6, 2021, Chicago Title removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);

3. On January 19, 2022, the parties submitted the first stipulation for an extension of time for Defendants to respond to Deutsche Bank’s complaint, which was granted by the Court on January 20, 2022 (ECF No. 24);

4. On February 23, 2022 the parties submitted the second stipulation for an extension of time for Defendants to respond to Deutsche Bank’s complaint, which was granted by the Court on February 24, 2022 (ECF No. 26);

5. On March 21, 2022, the parties submitted the third stipulation for an extension of time for Defendants to respond to Deutsche Bank’s complaint, which was granted by the Court on March 22, 2022 (ECF No. 28);

6. Counsel for Defendants request a further two-week extension for Defendants to file their respective responses to Deutsche Bank’s complaint, through and including Monday, May 9, 2022, to afford Defendants’ counsel additional time to review and respond to Deutsche Bank’s complaint.

7. Counsel for Deutsche Bank does not oppose the requested extension;

8. This is the fourth request for an extension made by counsel for Defendants, which is made in good faith and not for the purposes of delay.

9. This stipulation is entered into without waiving any of Defendants’ objections under Fed. R. Civ. P. 12.

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1           **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the  
2 complaint are hereby extended through and including Monday, May 9, 2022.

3 Dated: April 25, 2022

SINCLAIR BRAUN LLP

4  
5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR

Attorneys for Defendants

7 FIDELITY NATIONAL TITLE GROUP,

INC., CHICAGO TITLE INSURANCE

8 COMPANY, and TICOR TITLE OF

NEVADA, INC.

9 Dated: April 25, 2022

WRIGHT FINLAY & ZAK, LLP

10  
11 By: /s/-Lindsay D. Dragon

12 LINDSAY D. DRAGON

Attorneys for Plaintiff

13 DEUTSCHE BANK NATIONAL TRUST

COMPANY

14 **IT IS SO ORDERED.**

15 Dated this 26<sup>th</sup> day of April, 2022.

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18 DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE